

## REMARKS

Claims 1-16, 30-38, and 48-51 are currently pending in the application. Independent claims 1, 6, 11, 16, 30, 32, and 37 have been amended and new claims 48-51 are added. No new matter is introduced by any of the claim changes, and the amended and new claims are supported by the original specification (at, for example, page 29, lines 4-25, page 31, lines 15-20, page 33, lines 3-7 and Figs. 2A and 2B).

### 35 USC § 102(e) REJECTIONS

Claims 1, 3-7, 9, 13-15, 30, 32-35, and 37 are rejected under 35 USC § 102(e) over U.S. Patent Number 6,566,745 to Beyne, et al. ("Beyne"). Applicants assume that claim 16 is rejected over Beyne too, although the action does not indicate the basis upon which claim 16 is rejected. Applicants traverse these rejections, including any rejection of claim 16.

Each of the amended independent claims 1, 6, 11, 16, 30, 32, and 37 recites an adhering section disposed at least in a portion of a region where a light-transparent cover (or plate) opposes a pickup device and such that connection terminals are exposed. On pages 2 and 3 of the Office action, it is asserted that Beyne discloses an image sensor device comprising "an adhering section 15 for adhering the solid-state image pickup device 12 and light-transparent cover 11 (col. 6, lines 21-24)." As described and shown (in, for example, Figs. 1 and 3) in Beyne, 15 and 35 encapsulate the wires and wire bond connections. Thus, applicants submit that the assertion in the action is incorrect, and furthermore that Beyne does not teach or suggest at least exposed connection terminals.

35 USC § 103(a) REJECTIONS


Claims 2, 8, 10-12, 31, 36, and 38 are rejected under 35 USC § 103(a) over Beyne in view of Hashimoto (US Pub. 2003/0123779) ("Hashimoto"). Applicants also traverse these rejections.

Beyne is addressed above. Hashimoto also fails at least to teach or suggest exposed connection terminals, and thus any combination of Beyne and Hashimoto would not have rendered obvious any of the claims.

## **CONCLUSION**

In view of the foregoing, applicants request reconsideration, withdrawal of all rejections, and allowance of all pending claims (i.e., claims 1-16, 30-38, and 48-51) in due course.

Respectfully submitted,



Dated: April 11, 2005

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